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 and Mary Agnes (Maggie) Wilderotter*

Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

In re LYFT INC. SECURITIES LITIGATION

MASTER FILE NO. 4:19-CV-02690-HSG

This Document Relates to:
 ALL ACTIONS

**JOINT STIPULATION AND
 ORDER REGARDING
 DEFENDANTS' FILING OF
 SUPPLEMENTAL DECLARATION IN
 SUPPORT OF DEFENDANTS'
 OPPOSITION TO CLASS
 CERTIFICATION**

Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant (Sean) Aggarwal, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes (Maggie) Wilderotter (the “Defendants”) and Lead Plaintiff Rick Keiner (the “Plaintiff,” and together with the Defendants, the “Parties”), through their counsel, submit the following Joint Stipulation and [Proposed] Order regarding Defendants’ filing of a supplemental declaration in support of Defendants’ Opposition to Plaintiff’s Motion for Class Certification (ECF No. 117).

WHEREAS, on September 25, 2020, Plaintiff filed a Motion for Class Certification (the “Motion”) (ECF No. 98) and the supporting Declaration of Whitney E. Street (ECF 98-1);

WHEREAS, on January 19, 2021, Defendants filed an Opposition to the Motion (ECF No. 117) and the supporting Declaration of Meryn C. N. Grant (ECF No. 118) with attached declarations from investors who purchased shares in Lyft’s initial public offering (ECF No. 118-1).

WHEREAS, on February 5, 2021, Plaintiff filed his Reply in support of the Motion (ECF No. 127);

WHEREAS, the hearing on the Motion is scheduled for March 11, 2021;

WHEREAS, Defendants have gathered more declarations from investors who purchased shares in Lyft’s initial public offering that Defendants believe will aid the Court in evaluating the Motion and intend to submit them as an exhibit to a Supplemental Declaration of Meryn C. N. Grant in support of Defendants’ Opposition to the Motion;

WHEREAS, Plaintiff does not agree that the investor declarations establish that any investor had actual knowledge that Lyft’s initial public offering registration statement contained untrue statements or omitted to disclose material facts and do not provide grounds for denying the Motion, but do not oppose their submission to the Court by Defendants;

WHEREAS, Defendants believe that there will still be sufficient time for the Court to consider the additional investor declarations before the hearing on the Motion, that the filing of the Supplemental Declaration will not alter the date of any event or deadline already fixed by

Court order, and that any further declarations obtained before the hearing will be submitted at the earliest possible opportunity;

NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate, subject to Court approval, that Defendants may file the Supplemental Declaration of Meryn C. N. Grant in Support of Defendants' Opposition to Plaintiff's Motion for Class Certification by March 5, 2021.

Stipulated and agreed to by:

Dated: March 5, 2021

BLOCK & LEVITON LLP

/s/ Jeffrey C. Block

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FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: March 5, 2021

/s/ Colleen C. Smith
Colleen C. Smith

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 3/5/2021


HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Judge